



www.frontieronline.com

Legal Services
180 South Clinton Avenue
Rochester, NY 14646-0700

Tel: 585.777.7270
Fax: 585.263.9986
gregg.sayre@frontiercorp.com

VIA FCC ELECTRONIC COMMENT FILING SYSTEM

April 9, 2007

Ex Parte Presentation

Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S. W.
Washington, DC 20554

**Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands
WT Docket No. 06-150**

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. 51.1206, Citizens Communications Company and its Frontier Communications subsidiaries, offer notice of ex parte contacts made April 6, 2007. The attached letters were delivered electronically to each Commissioner and their wireless advisors.

Please acknowledge receipt via email. Thank you.

Respectfully submitted,

Gregg C. Sayre
Associate General Counsel –
Eastern Region

cc: Ken Mason

Enclosures (5)



EX PARTE PRESENTATION

April 6, 2007

The Honorable Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, W T Docket
No. 06-150**

. Dear Chairman Martin,

I know the Commission is on a tight timeline to finalize rules for the upcoming 700 MHz auction. However, based on the recent proposal submitted by Frontline Wireless, Citizens Communications strongly urges the Commission to take the time necessary to fully evaluate their proposal. Additionally, I would recommend that the Commission develop a public record by releasing a NPRM allowing for comments on the Frontline proposal, along with the other items being considered by the FCC as part of the 700 MHz rulemaking proceedings.

Frontline Wireless seeks a nationwide license of 10MHz to be allocated as a part of the upcoming 700 MHz spectrum auction. **This** 10MHz of currently earmarked commercial spectrum would be adjacent to the 12MHz of public **safety** spectrum and would carry network build out requirements for public **safety**. Frontline also plans to offer commercial wholesale network services which would provide an opportunity for rural companies like Citizens to utilize this spectrum through wholesale agreements and to provide a broader selection of IP-based services to the customers we serve.

Other critical items that Citizens requests the Commission to strongly consider when finalizing the rules, includes allocating a percentage of the licenses by 734 CMA's, as opposed to auctioning all licenses by the very large 6 EAG's, as the original plan calls for. We also recommend that the Commission promote service to rural areas by providing bidding credits to rural providers that are willing to agree to certain build **out** requirements in those rural **areas**.



The Commission and Citizens share the goal of increasing the availability of broadband and wireless services to rural America. **This** auction is an opportunity to allow companies like Citizens that are focused on rural consumers to gain access to spectrum that will facilitate reaching that goal. Again, Citizens asks the Commission to take the necessary time to fully review the Frontline proposal and other critical issues which pertain to the 700 MHz rules that may increase the deployment and availability of advanced wireless services to rural America.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Burr". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ann Burr

W Government and Regulatory Affairs

cc: Erika ~~Olsen~~, Acting Legal Advisor – Wireless Issues



EX PARTE PRESENTATION

April 6, 2007

The Honorable Jonathon Adelstein
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, WT Docket No. 06-150

Dear Commissioner Adelstein,

I know the Commission is on a tight timeline to finalize rules for the upcoming 700 MHz auction. However, based on the recent proposal submitted by Frontline Wireless, Citizens Communications strongly urges the Commission to take the time necessary to fully evaluate their proposal. Additionally, I would recommend that the Commission develop a public record by releasing a NPRM allowing for comments on the Frontline proposal, along with the other items being considered by the FCC as part of the 700 MHz rulemaking proceedings.

Frontline Wireless seeks a nationwide license of 10 MHz to be allocated as a part of the upcoming 700 MHz spectrum auction. This 10 MHz of currently earmarked commercial spectrum would be adjacent to the 12 MHz of public safety spectrum and would carry network build out requirements for public safety. Frontline also plans to offer commercial wholesale network services which would provide an opportunity for rural companies like Citizens to utilize this spectrum through wholesale agreements and to provide a broader selection of IP-based services to the customers we serve.

Other critical items that Citizens requests the Commission to strongly consider when finalizing the rules, includes allocating a percentage of the licenses by 734 CMA's, as opposed to auctioning all licenses by the very large 6 EAG's, as the original plan calls for. We also recommend that the Commission promote service to rural areas by providing bidding credits to rural providers that are willing to agree to certain build out requirements in those rural areas.



The Commission and Citizens share the goal of increasing the availability of broadband and wireless services to rural America. This auction is an opportunity to allow companies like Citizens that are focused on rural consumers to gain access to spectrum that will facilitate reaching that goal. Again, Citizens asks the Commission to take the necessary time to fully review the Frontline proposal and other critical issues which pertain to the 700 MHz rules that may increase the deployment and availability of advanced wireless services to rural America.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Burr", written over a horizontal line.

Ann Burr

VP Government and Regulatory Affairs

cc: Barry Ohlson, Senior Legal Advisor, Legal Advisor for Spectrum and International Issues



EX PARTE PRESENTATION

April 6, 2007

The Honorable Michael Copps
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, W T Docket No. 06-150

Dear Commissioner Copps,

I know the Commission is on a tight timeline to finalize rules for the upcoming 700 MHz auction. However, based on the recent proposal submitted by Frontline Wireless, Citizens Communications strongly urges the Commission to take the time necessary to fully evaluate their proposal. Additionally, I would recommend that the Commission develop a public record by releasing a *NPRM* allowing for comments on the Frontline proposal, along with the other items being considered by the FCC as part of the 700 MHz rulemaking proceedings.

Frontline Wireless seeks a nationwide license of 10MHz to be allocated as a part of the upcoming 700 MHz spectrum auction. This 10MHz of currently earmarked commercial spectrum would be adjacent to the 12MHz of public safety spectrum and would carry network build out requirements for public safety. Frontline also plans to offer commercial wholesale network services which would provide an opportunity for rural companies like Citizens to utilize this spectrum through wholesale agreements and to provide a broader selection of IP-based services to the customers we serve.

Other critical items that Citizens requests the Commission to strongly consider when finalizing the rules, includes allocating a percentage of the licenses by 734 CMA's, as opposed to auctioning all licenses by the very large 6 EAG's, as the original plan calls for. We also recommend that the Commission promote service to rural areas by providing bidding credits to rural providers that are willing to agree to certain build out requirements in those rural areas.



The Commission and Citizens share the goal of increasing the availability of broadband and wireless services to rural America. This auction is an opportunity to allow companies like Citizens that are focused on rural consumers to gain access to spectrum that will facilitate reaching that goal. Again, Citizens ~~asks~~ the Commission ~~to~~ take the necessary time to fully review the Frontline proposal and other critical issues which pertain to the 700 MHz rules that may increase the deployment and availability of advanced wireless services to rural America.

Sincerely,


Ann Burr

VP Government and Regulatory Affairs

cc: Bruce Gottlieb, Wireless and International Legal Advisor



EX PARTE PRESENTATION

April 6, 2007

The Honorable Robert McDowell
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, W T Docket No. 06-150

Dear Commissioner McDowell,

I know the Commission is on a tight timeline to finalize rules for the upcoming 700 MHz auction. However, based on the recent proposal submitted by Frontline Wireless, Citizens Communications strongly urges the Commission to take the time necessary to fully evaluate their proposal. Additionally, I would recommend that the Commission develop a public record by releasing a NPRM allowing for comments on the Frontline proposal, along with the other items being considered by the FCC as part of the 700 MHz rulemaking proceedings.

Frontline Wireless seeks a nationwide license of 10 MHz to be allocated as a part of the upcoming 700 MHz spectrum auction. This 10 MHz of currently earmarked commercial spectrum would be adjacent to the 12 MHz of public safety spectrum and would carry network build out requirements for public safety. Frontline also plans to offer commercial wholesale network services which would provide an opportunity for rural companies like Citizens to utilize this spectrum through wholesale agreements and to provide a broader selection of IP-based services to the customers we serve.

Other critical items that Citizens requests the Commission to strongly consider when finalizing the rules, includes allocating a percentage of the licenses by 734 CMA's, as opposed to auctioning all licenses by the very large 6 EAG's, as the original plan calls for. We also recommend that the Commission promote service to rural areas by providing bidding credits to rural providers that are willing to agree to certain build out requirements in those rural areas.



The Commission and Citizens share the goal of increasing the availability of broadband and wireless services to rural America. **This** auction is an opportunity to allow companies like Citizens that are focused on rural consumers to gain access to spectrum that will facilitate reaching that goal. Again, Citizens ~~asks~~ the Commission to take the necessary time to fully review the Frontline proposal and other critical issues which pertain to the 700 MHz rules that may increase the deployment and availability of advanced wireless services to rural America.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Burr".

Ann Burr

VP Government and Regulatory Affairs

cc: Angelo Giancarlo, Legal Advisor – Wireless and International Issues



EX PARTE PRESENTATION

April 6, 2007

The Honorable Deborah Taylor Tate
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, WT Docket No. 06-150

Dear Commissioner Tate,

I know the Commission is on a tight timeline to finalize rules for the upcoming 700 MHz auction. However, based on the recent proposal submitted by Frontline Wireless, Citizens Communications strongly urges the Commission to take the time necessary to fully evaluate their proposal. Additionally, I would recommend that the Commission develop a public record by releasing a NPRM allowing for comments on the Frontline proposal, along with the other items being considered by the FCC as part of the 700 MHz rulemaking proceedings.

Frontline Wireless seeks a nationwide license of 10 MHz to be allocated as a part of the upcoming 700 MHz spectrum auction. ~~This~~ 10 MHz of currently earmarked commercial spectrum would be adjacent to the 12 MHz of public safety spectrum and would carry network build out requirements for public safety. Frontline also plans to ~~offer~~ commercial wholesale network services which would provide an opportunity for rural companies like Citizens to utilize this spectrum through wholesale agreements and to provide a broader selection of IP-based services to the customers we serve.

Other critical items that Citizens requests the ~~Commission~~ to strongly consider when finalizing the rules, includes allocating a percentage of the licenses by 734 CMA's, as opposed to auctioning all licenses by the very large 6 EAG's, as the original plan calls for. We also recommend that the Commission promote service to rural areas by providing bidding credits to rural providers that are willing to agree to certain build out requirements in those rural areas.



The Commission and Citizens share the goal of increasing the availability of broadband and wireless services to rural America. This auction is an opportunity to allow companies like Citizens that are focused on rural consumers to gain access to spectrum that will facilitate reaching that goal. Again, Citizens ~~asks~~ the Commission to take the necessary time to fully review the Frontline proposal and other critical issues which pertain to the 700 MHz rules that may increase the deployment and availability of advanced wireless services to rural America.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Burr".

Ann Burr

VP Government and Regulatory Affairs

cc: Aaron Goldberger - Legal Advisor